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*Attorneys for Defendant
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HONG-AN VU IN
SUPPORT OF DEFENDANT OTTO
TRUCKING'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS MOTION TO
COMPEL**

Courtroom: F, 15th Floor
Judge: Honorable Jacqueline S. Corley
Trial Date: October 10, 2017
Filed/Lodged Concurrently with:
1. Admin. Mtn. to File Documents Under Seal
2. [Proposed] Order
3. Redacted/Unredacted Versions
4. Proof of Service

I, Hong-An Vu, declare as follows:

1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendant Otto Trucking’s Administrative Motion to File Under Seal Portions of its Motion to Compel (the “Motion”).

2. I have reviewed the following documents and confirmed that only the portions identified below merit provisional sealing:

Document	Portions to Be Filed Under Seal
Letter Brief re Motion to Compel	Highlighted portions
Vu Declaration	Highlighted portions
Exhibit 3 to Vu Declaration	Entire document
Exhibit 4 to Vu Declaration	Entire document
Exhibit 5 to Vu Declaration	Entire document
Exhibit 6 to Vu Declaration	Entire document
Exhibit 7 to Vu Declaration	Entire document
Exhibit 8 to Vu Declaration	Highlighted portions
Exhibit 9 to Vu Declaration	Highlighted portions
Exhibit 11 to Vu Declaration	Entire document
Exhibit 12 to Vu Declaration	Entire document
Exhibit 13 to Vu Declaration	Entire document
Exhibit 14 to Vu Declaration	Entire document
Exhibit 15 to Vu Declaration	Entire document
Exhibit 16 to Vu Declaration	Highlighted portions
Exhibit 17 to Vu Declaration	Highlighted portions

/s/ Hong-An Vu
Hong-An Vu